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HSBC BANK, USA, NATIONAL
ASSOCIATION, AS TRUSTEE FOR
MORTGAGE PASS-THROUGH
CERTIFICATES, MLMI SERIES 2006-A4,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

Defendants.

Case No.: 2:21-cv-00195-RFB-DJA

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF
No. 9] AND MOTION FOR FEES AND
COSTS [ECF No. 10]**

(First Request)

Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff HSBC Bank USA, National Association, as Trustee for Mortgage Pass-Through Certificates, MLMI Series 2006-A4 (“HSBC Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On February 3, 2021, HSBC Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-828889-C [ECF No. 1-1];
2. On February 3, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On March 5, 2021, HSBC Bank filed a Motion for Remand [ECF No. 9];
4. On March 5, 2021, HSBC Bank filed a Motion for Costs and Fees [ECF No. 10];
5. Chicago Title’s deadline to respond to HSBC Bank’s Motion for Remand and Motion for Costs and Fees is March 19, 2021;
6. Chicago Title’s counsel is requesting an extension until April 2, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
7. Chicago Title requests a brief extension of time to respond to the Motion for Remand and Motion for Costs and Fees to afford Chicago Title additional time to respond to the legal arguments set forth in HSBC Bank’s motions;
8. HSBC Bank does not oppose the requested extension;
9. This is the first request for an extension which is made in good faith and not for purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to HSBC Bank's
2 Motion for Remand [ECF No. 9] and Motion for Costs and Fees [ECF No. 10] is hereby extended
3 through and including April 2, 2021.

4
5 Dated: March 17, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

10 Dated: March 17, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
12 KEVIN S. SINCLAIR
13 Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

14 Dated: March 17, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins
16 LINDSAY D. ROBBINS
17 Attorneys for Plaintiff HSBC BANK, U.S.A,
N.A.

18 **IT IS SO ORDERED:**

19
20 Dated: March 25, 2021.

21 
22 **RICHARD E. BOULWARE, II**
23 **United States District Court**

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

